

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (CGM)

SIPA Liquidation

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the  
Substantively Consolidated SIPA Liquidation  
of Bernard L. Madoff Investment Securities  
LLC and the Chapter 7 Estate of Bernard L.  
Madoff,

Plaintiff,

v.

ASB BANK CORP.,

Defendant.

Adv. Pro. No. 11-02730 (CGM)

**STIPULATION AND ORDER  
TO EXTEND INITIAL DISCLOSURE DEADLINE**

Irving H. Picard (the “Trustee”), as trustee for the substantively consolidated liquidation of the business of Bernard L. Madoff Investment Securities LLC, under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa–III, and the estate of Bernard L. Madoff, under Chapter 7 of the United States Bankruptcy Code, 11 U.S.C. §§ 701-784, and defendant ASB Bank Corp. (“Defendant,” and together with the Trustee, the “Parties”), by and through their respective undersigned counsel, stipulate and agree as follows:

**WHEREAS**, on June 5, 2023, the United States Bankruptcy Court for the Southern District of New York entered a Case Management Plan in this action, which required that the Parties serve initial disclosures on or before August 4, 2023 (the “Initial Disclosure Deadline”) (ECF No. 133); and

**WHEREAS**, the Parties have conferred and agreed to extend the Initial Disclosure Deadline.

**IT IS HEREBY STIPULATED AND AGREED**, by the Parties, and **SO ORDERED**, by the Court:

1. The Initial Disclosure Deadline shall be extended to August 25, 2023.
2. The Parties otherwise reserve all rights, arguments, objections, and defenses they may have, and their entry into this stipulation shall not impair or otherwise affect any such rights, arguments, objections, and defenses.

*[Signatures on following page]*

Dated: July 25, 2023  
New York, New York

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*Attorneys for Plaintiff Irving H. Picard,  
Trustee for the Substantively Consolidated SIPA  
Liquidation of Bernard L. Madoff Investment  
Securities LLC and the Chapter 7 Estate of  
Bernard L. Madoff*

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*Attorneys for Defendant ASB Bank Corp.*

**Dated: July 26, 2023**  
**Poughkeepsie, New York**



/s/ Cecelia G. Morris

**Hon. Cecelia G. Morris**  
**U.S. Bankruptcy Judge**